## **EXHIBIT B**

Case: 1:25-cv-00213 Document #: 35-2 Filed: 08/07/25 Page 2 of 4 PageID #:236



ShaRayne Jackson Lead Privacy Specialist, Legal

July 18, 2025

Paul Heeringa Manatt, Phelps & Phillips, LLP Times Square New York, NY 10036 **Re:** Charter Subscriber Information Request Dated

Dear Paul Heeringa,

Charter Case ID: 330984

Charter Communications Operating, Inc., ("Charter") acknowledges receipt of the above referenced subpoena for subscriber information. Please note that a cable operator, such as Charter, must protect its subscribers' privacy in compliance with Section 631 of the Communications Act of 1934 (codified at 47 U.S.C. § 551), pursuant to which Charter may not provide subscriber information to a third party without first ensuring compliance with the requirements of Section 631(c). This section requires written subscriber consent before their information can be disclosed to third parties. Because there is no written consent from the subscriber, Charter must determine if one of the exceptions in Section 631(c)(2) has been met before making any disclosure. The exception applicable here is in Section 631(c)(2)(B), which requires a court order and notice to the subscriber before disclosure of any information could be made. Since a court order has not been issued in this case, Charter cannot disclose the information you requested to you under this exception.

Attached to this letter you will find an example court Order. If you obtain a court Order on this template and signed by a judge, Charter will comply with the court Order. Please be aware that Charter will need sufficient time prior to disclosure to process and provide our customer with notice of the court order as required by Section (c)(2)(B) of the Act

Please note, the specific target IP address in your request is part of a new Charter Communications IP assignment protocol which uses Carrier Grade Network Address Translation (NAT). As a result, there is insufficient information to identify the correct target user. Please provide the port number(s) in order for Charter to proceed with your request. The port number is a 4-to-5-digit number that would be captured by the website or application that provided the IP initially. Please provide written documentation of the port number for your request by email to leroc@charter.com.

If you intend to obtain a court order or subscriber consent, please send the documents by email to <a href="lerco@charter.com">lerco@charter.com</a> within thirty (30) days of this letter. In any correspondence, please reference the Charter case number that is printed above.

Charter will take no further action on your request until we receive a written response from your office supplying the missing information. We understand this satisfies Charter's obligations in this regard. Please note that Charter will preserve the requested information for two (2) years from the date of this letter. At that time, the requested information will be deleted in accordance with Charter's normal retention schedule and may no longer be available.

Charter's billing and customer records from which the above information is obtained are subject to human error and Charter cannot always guarantee the accuracy of such records. You should not rely solely on this information and should always independently corroborate the information Charter provides with other information you have concerning the identity of the individual.

We understand this satisfies Charter's obligations in this regard. If you would like to discuss this matter, please contact me at (314) 394-9731. When calling, please reference Charter case number 330984.

Respectfully.

ShaRayne Jackson, Lead Privacy Specialist, Legal

ShaRayne.Jackson@charter.com

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www.charter.com/lea

## **SAMPLE**

IN THE\_\_\_\_\_COURT OF \_\_\_\_\_

V.	
Defendants.	No
2 of official rice.	
[PROPOSED] ORDER DIRECTING THE PRODUCTION OF	RECORDS PURSUANT TO THE FEDERAL COMMUNICATIONS
	ACT
UPON CONSIDERATION of the [Request/Motion/Stipulation]	dated, filed
by("Defendant/Plaint	iff') seeking the production of records or information that contain or
disclose Personally Identifiable Information ("PII") concerning ind	lividual subscribers associated with [target identifier and details], that
were registered to non-party Charter Communications, Inc. ("Ch	arter"), and the entire record in this proceeding, it is this day
of, hereby	
ORDERED , that counsel for [Law Firm's Name] shall provide 0	Charter with a copy of this Order and agree to pay reasonable copying
and search costs for producing responsive records and/or infor	
ORDERED that disclosure of the name(s) and address(es) of	Charter subscriber(s) ("Subscriber(s)") may be appropriate and
necessary for the disposition of this proceeding; and it is further	
	rter shall give notice to any Subscriber who was associated with
	Charter has been ordered to disclose his or her name and address
	s such Subscriber responds or objects no later than fourteen (14) days
from the date that notice is provided; and it is further	
ORDERED, that Charter advise the Plaintiff of the date the Sul	oscriber(s) were notified and further whether any Subscriber has
responded or indicated an intention to oppose disclosure withir	the fourteen (14) days provided for a response; and it is further
ORDERED that if no response or intention to oppose is filed o	or served, Charter shall disclose the relevant name(s) and address(es)
of the Subscriber(s) within ten (10) days thereafter, however pro	
	es disclosure of his or her PII within the allotted time period, Charter
	and until this Court considers and disposes of any such challenge.
Dated thisday of,	
	Hon
	Judge

## RELEASE OF CUSTOMER ACCOUNT INFORMATION

Please print clearly. Request may be delayed or denied if unreadable or incomplete. This release must be signed <u>and</u> notarized for Charter to release your records. Requests may take <u>up to 30 days</u> to process.

Authorization will only				

, , , , , , , , , , , , , , , , , , ,				
Full Name of individual signing release				
For Commercial Accounts Business Name:		Position/ Title of Officer authorizing:		
Account Address				
Contact Telephone Number				
Account Information:	Charter Account Number	Security Code		
Specific Records Requested (example: call logs for 555-555-5555)				
Time Period (MM/DD/YY)	From	То		
Charter should send the requested records to:  If left blank, Charter will mail records to your service address only.  E-mail: (will only be used for delivery to an attorney or Law Enforcement Officer)	Name: Address: Fax Email:			
		Information, specifically the information written above, relating to may have under any agreement or state or federal law, including restrict the use of information or records so provided.  In the absence of a record for a particular event does not mean ustem. Further, some of the information contained in Charter's secords are subject to human error, technical limitations and hy records provided. Further, note that subscriber authorization carn. Certain records maintained by Charter regarding a customer compulsion.		
Dated:,20				
	ACKNOWLED	GEMENT Signature		
State Of)  County Of)				
On thisday of 20, b	efore me, a notary public, the und	dersigned officer, personally		
appeared, known	to me (or satisfactorily proven) to	o be the person whose name is subscribed to the		
within instrument, and acknowledged that he exec	uted the same for the purposes	therein contained.		
IN TESTIMONY WHEREOF, I have hereunto se and official seal.	my hand	Notary Public My commission expires:		
Please <b>EMAIL</b> Completed Release to <u>leroc@charter.com</u> (Preferred Method) v7-2020by		ted Release to: unications, Inc. LEROC pourt Drive. Saint Louis. Mssouri 63131		

12405 Powerscourt Dr., St. Louis, MO 63131 T: 314-394-9702 Email: <a href="mailto:leroc@charter.com">leroc@charter.com</a>